

Document Log

From		To	
"Naomi T" <WQS@badriver.com>		Kathleen Mayo/R5/USEPA/US@EPA	
CC		BCC	
"Pamela Roberts" <wqscoordinator@badriver.com>			
Subject		Date/Time	
RE: Spreadsheet to modify Great Lakes Human Health Criteria		03/09/2010 12:21 PM	

Document Body

Hi Kathy,

Thanks for the information. I skimmed a lot of the EPA documents from 1995 related to Great Lakes Water Quality Initiative Criteria, and I did come across discussions of the fish consumption rate the EPA chose. I was just unclear how to break down our proposed fish consumption rate into the two different trophic levels, but you cleared that up, and we will use the same percentage.

Hopefully, by the end of the week, Pam will send you our draft water quality document so we can start the back and forth process.

Thanks,
Naomi

-----Original Message-----

From: Mayo.Kathleen@epamail.epa.gov [mailto:Mayo.Kathleen@epamail.epa.gov]
Sent: Tuesday, March 09, 2010 8:58 AM
To: Naomi T
Subject: RE: Spreadsheet to modify Great Lakes Human Health Criteria

Hi Naomi,

Yes, you are correct. The fish consumption rate is divided into a certain percentage of consumption of top predators (trophic level 4 fish) and a lesser amount of trophic level 3 fish.

I believe all the Tribes in R5 that have modified their human health criteria have left the percentages as is, and just calculated the new appropriate amounts based upon the overall fish consumption rate. You may modify these percentages, however, if you know for sure the Tribe is consuming something different than the default values that EPA uses.

I have a meeting in just a few minutes, but when I return I'll try to find more info where you can read about the default rates EPA has chosen.

Kathy

From: "Naomi T" <WQS@badriver.com>

To: Kathleen Mayo/R5/USEPA/US@EPA

Cc: "'Pamela Roberts'" <WQSCoordinator@badriver.com>

Date: 03/09/2010 07:24 AM

Subject: RE: Spreadsheet to modify Great Lakes Human Health Criteria

Hi Kathy,

We noticed that in the spreadsheet you sent us the EPA's fish consumption rate of 15 g/day was broken down into 3.6 g/day for trophic level 3 fish and 11.4 g/day for trophic level 4 fish. Do you what criteria the EPA used to subdivide the 15 g/day into the different trophic levels (or where we could find the criteria)? If we decide to go with a higher fish consumption rate, how do we subdivide this rate into the different trophic levels?

Thanks for your help!

Naomi

Naomi Tillison
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(715) 682-7123

-----Original Message-----

From: Mayo.Kathleen@epamail.epa.gov [mailto:Mayo.Kathleen@epamail.epa.gov]
Sent: Monday, January 25, 2010 4:07 PM
To: Naomi T; Pamela Roberts
Cc: Kawakami.Cynthia@epamail.epa.gov; Wester.Barbara@epamail.epa.gov; Norling.Francine@epamail.epa.gov
Subject: Spreadsheet to modify Great Lakes Human Health Criteria

(See attached file: GLIhhCRIT.XLS)

Hi Pam and Naomi,

I'm attaching my spreadsheet for the Great Lakes human health criteria. These are commonly modified by Tribes in the following ways:

1) Fish consumption: Tribes use their own fish consumption rates, rather than EPA's default rate. In 1995 when EPA developed the regulations for the Great Lakes basin, EPA used a 15 g/day rate within these calculations, and the grams of fish consumed by humans was further subdivided into tier 3 and tier 4 (top predators) amounts. EPA has recently settled on a new fish consumption rate for areas outside the basin of 17.5 g/day, but has not yet updated the Great Lakes criteria. So, at a minimum, you'd only be held to having a rate of 15, but updating to at least 17.5 is a good idea. If you want higher, it should be supported by a tribal survey or research study, etc. Most of the Tribes in Region 5 use higher rates, as we discussed on the phone (32 g/day for Lac du Flambeau, 60 g/day for Fond du Lac, and 142 g/day for Grand Portage). The higher you go with the fish consumption rate, the lower (more protective) your numeric criteria will become.

2) Cancer Risk Levels: Two of the Tribes mentioned above also modify the cancer risk levels. The Great Lakes criteria use a default risk level of 1 additional cancer in 100,000 people. Fond du Lac keeps the default risk level, but Lac du Flambeau and Grand Portage have opted for a more protective cancer risk level of 1 additional cancer in 1,000,000.

If you choose to modify the criteria, there is also a requirement to notify all the Great Lakes States and Tribes. Grand Portage has done this and may have a template letter you could view. Hopefully when you chat with Margaret Watkins at Grand Portage you can ask her about the notification.

Let me know if you have any questions, or need help with the spreadsheet.
Kathy